

Exhibit 4

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

**SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO.:**

**Jane Doe, individually and on behalf of all
others similarly situated,**

Plaintiff,

v.

Steward Health Care System LLC,

Defendant.

Plaintiff's Motion to Proceed in Pseudonym

Plaintiff, by counsel, respectfully moves this Court to allow her to proceed in this action under the pseudonym Jane Doe. In support of this motion, Plaintiff states that through this action, Plaintiff seeks to remedy harms imposed due to the Defendant's conduct in sharing her private protected health information and individually identifiable health information with Meta Platforms, Inc.'s social media application, Facebook, and with Google, without her consent, and that further disclosure of her identity would only magnify the harm she has already suffered.

WHEREFORE, Plaintiff respectfully requests that the Court allow this motion and allow her to proceed in this action under the pseudonym Jane Doe.

Dated: January 23, 2023

Respectfully submitted,

/s/ John Roddy

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